

**From:** Hurwitz, Evelyn S on behalf of Public Info  
**Sent:** Monday, November 20, 2000 11:40 AM  
**To:** Gottlieb, Mary H  
**Subject:** FW: Docket No. 2000-81

-----Original Message-----

From: Rick Taylor [mailto:rtaylor@southfirst.com]  
Sent: Monday, November 20, 2000 11:30 AM  
To: public.info@ots.treas.gov  
Cc: kschmidt@southfirst.com; atyler@southfirst.com;  
cjones@southfirst.com  
Subject: Docket No. 2000-81

I have reviewed the Circular Letter 538-00 from the Federal Reserve Bank of Atlanta concerning the sharing of information among financial institution affiliates.

Our institution is a small community bank in a small town. We are in the initial stages of beginning the process of complying in full with the requirements set forth in the Gramm Leach Bliley Act "GLBA".

Our comment concerning the GLBA requirements is the burden that the Act will place on small financial institutions in monitoring and complying with the many details of the Act. It seems only proper for an institution be allowed to share consumer information with its affiliates without being considered a consumer reporting agency.

The requirements as set forth by GLBA will more than likely create a sort of "financial gridlock" in that financial institutions will prefer to not share any financial information with anyone (affiliate or non affiliate) in order to avoid consumer litigation by sharing information that is not permitted by GLBA unless certain criteria are met i.e, opt out.

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